

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
YUETING JIA, ¹)	Case No.: 19-12220 (KBO)
)	
Debtor.)	

**DECLARATION OF JAMES E. O'NEILL IN SUPPORT OF DEBTOR'S APPLICATION
PURSUANT TO SECTION 327(a) OF THE BANKRUPTCY CODE, RULE 2014 OF THE
FEDERAL RULES OF BANKRUPTCY PROCEDURE AND LOCAL RULE 2014-1 FOR
AUTHORIZATION TO EMPLOY AND RETAIN PACHULSKI STANG ZIEHL &
JONES LLP AS COUNSEL FOR THE DEBTOR
AND DEBTOR IN POSSESSION NUNC PRO TUNC TO THE PETITION DATE**

I, James E. O'Neill, declare under penalty of perjury as follows:

1. I am a partner in the law firm of Pachulski Stang Ziehl & Jones LLP ("PSZ&J" or the "Firm"), located at 919 North Market Street, 17th Floor, Wilmington, Delaware, 19801 and have been duly admitted to practice law in the State of Delaware. This supplemental declaration is submitted in support of the *Debtor's Application Pursuant to Section 327(a) of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for Authorization to Employ and Retain Pachulski Stang Ziehl & Jones LLP as Counsel for the Debtor and Debtor in Possession Nunc Pro Tunc to the Petition Date* (the "Application") [Docket No. 18], filed on October 17, 2019.²

¹ The last four digits of the Debtor's federal tax identification number is 8972. The Debtor's mailing address is 91 Marguerite Drive, Rancho Palos Verdes, CA 90275.

² Capitalized terms, unless otherwise defined herein, shall have the meanings ascribed to them in the Application.

2. Pursuant to the Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11 Cases (the “2013 UST Guidelines”), the Firm makes certain disclosures herein.

1. Pursuant to Part D1 of the 2013 UST Guidelines, PSZ&J is seeking employment as counsel for the Debtor under section 327 of the Bankruptcy Code and it hereby provides the following responses set forth below:

Questions required by Part D1 of 2013 UST Guidelines:	Answer:	Further explanation:
Did you agree to any variations from, or alternatives to, your standard or customary billing arrangements for this engagement?	No.	N/A
Do any of the professionals included in this engagement vary their rate based on the geographic location of the bankruptcy case?	No.	N/A
If you represented the client in the 12 months prepetition, disclose your billing rates and material financial terms for the prepetition engagement, including any adjustments during the 12 months prepetition. If your billing rates and material financial terms have changed postpetition, explain the difference and reasons for the difference.	<p>PSZ&J represented the client during the 12 month period prepetition in connection with preparation of the filing of the Case.</p> <p>The material financial terms for the prepetition engagement remained the same as the engagement was hourly-based subject to economic adjustment.</p> <p>The billing rates and material financial terms for the postpetition period remain the same as the prepetition period</p>	None.

	subject to an annual economic adjustment. The standard hourly rates of PSZ&J are subject to periodic adjustment in accordance with the Firm's practice.	
Has your client approved your respective budget and staffing plan, and, if so, for what budget period?	The Debtor and PSZ&J expect to develop a prospective budget and staffing plan to comply with the U.S. Trustee's requests for information and additional disclosures, recognizing that in the course of this large chapter 11 case, there may be unforeseeable fees and expenses that will need to be addressed by the Debtor and PSZ&J.	In accordance with the 2013 UST Guidelines, the budget may be amended as necessary to reflect changed circumstances or unanticipated developments.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 25, 2019

/s/ James E. O'Neill
James E. O'Neill